

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA  
READING DIVISION

IN RE: ) CASE NO. 19-13220-PMM  
JOHN THOMAS KEENAN ) CHAPTER 13  
DEBTOR )  
)

**NOTICE OF APPEARANCE PURSUANT TO BANKRUPTCY RULE 9010 (b) AND  
REQUEST FOR NOTICES UNDER BANKRUPTCY RULE 2002 REGARDING  
PROPERTY DESCRIBED AS 5177 FOXCROFT DR, SCHNECKSVILLE, PA 18078  
AND THAT CERTAIN LOAN MORE SPECIFICALLY IDENTIFIED AS LOAN  
NUMBER \*\*\*\*\*3856**

NOW COMES Freedom Mortgage Corporation, by and through its attorney Brock and Scott, PLLC, pursuant to Bankruptcy Rule 9010 and makes its appearance as a creditor in this cause and, pursuant to Bankruptcy Rule 2002, requests that it be noticed on all pleadings, documents and hearings; that it receive copies of all documents; and be added to the matrix to be served at the addresses below:

Mario Hanyon  
Brock and Scott, PLLC  
Attorneys at Law  
302 Fellowship Road, Ste 130  
Mount Laurel, NJ 08054  
pabkr@brockandscott.com

Freedom Mortgage  
10500 Kincaid Drive  
Fishers, Indiana 46037

Please take notice that the undersigned hereby appears as counsel for Freedom Mortgage Corporation pursuant to Bankruptcy Rule 9010(b). The undersigned's filing of this notice is limited to the instant case noted above and should not be construed as unlimited representation of the

21-08190 BKSUP01



Creditor with respect to any and all matters, proceedings, or actions that may be taken in the instant case or any associated case or proceeding involving the above-named Creditor.

RESPECTFULLY SUBMITTED,

/s/ Mario Hanyon

Mario Hanyon  
Attorney at Law (203993)  
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